

1 PAUL HASTINGS LLP  
2 CHRIS A. JALIAN (SB# 295564)  
3 chrisjalian@paulhastings.com  
4 AJA NUNN (SB# 347676)  
5 ajanunn@paulhastings.com  
6 515 South Flower Street  
7 Twenty-Fifth Floor  
8 Los Angeles, California 90071-2228  
9 Telephone: (213) 683-6000  
10 Facsimile: (213) 627-0705

11 Attorneys for Defendant  
12 CLUB DEMONSTRATION SERVICES, INC.

13 *[Additional counsel on signature page]*

14 UNITED STATES DISTRICT COURT  
15 EASTERN DISTRICT OF CALIFORNIA

16 WILLIAM GUSTIN, an individual, on behalf of  
17 himself and on behalf of all persons similarly  
18 situated,

19 Plaintiff,

20 vs.

21 CLUB DEMONSTRATION SERVICES, INC.,  
22 a Corporation; and DOES 1 through 50,  
23 inclusive,

24 Defendants.

CASE NO. 1:25-cv-00579-JLT-BAM

**JOINT STIPULATION TO SET  
BRIEFING SCHEDULE FOR  
DEFENDANT'S MOTION TO COMPEL  
ARBITRATION AND DISMISS ALL  
CLAIMS**

1 Pursuant to Civil Local Rule 144, Plaintiff William Gustin (“Mr. Gustin”) and Defendant  
2 Club Demonstration Services, Inc. (“CDS”), by and through their attorneys of record, hereby  
3 stipulate as follows:

4 WHEREAS, on October 15, 2025, CDS filed its Motion to Compel Arbitration and Dismiss  
5 All Claims (the “Motion”), ECF No. 21;

6 WHEREAS, pursuant to the United States District Court for the Eastern District of  
7 California Local Rule 230, Plaintiff’s deadline to file his Opposition to the Motion was October 29,  
8 2025;

9 WHEREAS, on November 7, 2025, Plaintiff filed his Opposition to the Motion, ECF No.  
10 23;

11 WHEREAS, on November 7, 2025, Plaintiff’s counsel contacted CDS’s counsel to notify  
12 him that an inadvertent calendaring error led to Plaintiff’s untimely filing of his Opposition to the  
13 Motion;

14 WHEREAS, on November 7, 2025, Plaintiff filed his Motion for Extension of Time Due to  
15 Excusable Neglect Pursuant to Federal Rule of Civil Procedure 6(b)(1)(B), ECF No. 24;

16 WHEREAS, on November 7, 2025, counsel for CDS confirmed via email to Plaintiff’s  
17 counsel that CDS would not oppose Plaintiff’s Motion for Extension of Time;

18 WHEREAS, on November 10, 2025, the Parties met and conferred and agreed to a mutual  
19 extension of the Parties’ respective briefing deadlines relating to CDS’s pending Motion and  
20 pursuant to such extended briefing schedule, Plaintiff’s Opposition (ECF No. 23) would be deemed  
21 timely filed;

22 NOW, THEREFORE, the parties, through their respective counsel, stipulate to request an  
23 order changing time as follows:

24 1. Plaintiff shall file his Opposition to CDS’s Motion to Compel Arbitration and  
25 Dismiss All Claims by Friday, November 7, 2025.

26 2. CDS shall file its Reply in Support of its Motion to Compel Arbitration and Dismiss  
27 All Claims by Tuesday, November 25, 2025.

3. CDS's Motion to Compel Arbitration and Dismiss All Claims shall be heard on Friday, December 12, 2025, or on the Court's first available hearing date thereafter.

4. For the Court's convenience, the parties' proposed schedule is summarized below:

Date	Event
November 7, 2025	Deadline for Plaintiff's Opposition to Motion to Compel Arbitration and Dismiss All Claims
November 25, 2025	Deadline for CDS's Reply in Support of Motion to Compel Arbitration and Dismiss All Claims
December 12, 2025	Hearing on Motion to Compel Arbitration and Dismiss All Claims

**IT IS SO STIPULATED.**

Dated: November 12, 2025

**BLUMENTHAL NORDREHAUG  
BHOWMIK DE BLOUW LLP**

By: /s/ Jeffrey Herman

Norman B. Blumenthal (SB #068687)  
 Kyle R. Nordrehaug (SB #205975)  
 Aparajit Bhowmik (SB #248066)  
 Jeffrey S. Herman (SB #280058)  
 Sergio J. Puche (SB #289437)  
 Trevor G. Moran (SB # 330394)  
 2255 Calle Clara  
 La Jolla, CA 92037  
 Telephone: (858)551-1223  
 Facsimile: (858) 551-1232

Attorneys for Plaintiff  
 WILLIAM GUSTIN

**PAUL HASTINGS LLP**

By: /s/ Chris A. Jalian

CHRIS A. JALIAN (SB# 295564)  
 chrisjalian@paulhastings.com  
 AJA NUNN (SB# 347676)  
 ajanunn@paulhastings.com  
 515 South Flower Street  
 Twenty-Fifth Floor  
 Los Angeles, California 90071-2228  
 Telephone: (213) 683-6000  
 Facsimile: (213) 627-0705

Attorneys for Defendant  
 CLUB DEMONSTRATION SERVICES, INC.

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)**

I, Chris A. Jalian, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 12th day of November 2025, in Los Angeles, California.

/s/ Chris A. Jalian

Chris A. Jalian

**ORDER**

Pursuant to Civil Local Rule 144 and the Joint Stipulation to Set Briefing Schedule for Defendant's Motion to Compel Arbitration and Dismiss All Claims, the briefing schedule shall be modified so that:

1. Plaintiff shall file his Opposition to CDS's Motion to Compel Arbitration and Dismiss All Claims by Friday, November 7, 2025;

2. CDS shall file its Reply in Support of its Motion to Compel Arbitration and Dismiss All Claims by Tuesday, November 25, 2025; and

3. CDS's Motion to Compel Arbitration and Dismiss All Claims shall be heard on **Monday, January 5, 2026 at 1:30 p.m.** in Courtroom 4 (JLT) before District Judge Jennifer L. Thurston.

IT IS SO ORDERED.

Dated: November 13, 2025

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE